

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: P & G  
Address: 1900 Kansas Ave  
KC, KS 66105  
EPA ID Number: KSD007130032 Date: 2/24/16 - 2/25/16

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation <sup>as incorporated  
in the KS state  
regulations</sup>

Description of Violation

- ① KAR 28-31-262 → 40 CFR 262.11 Make a HW determination on the following:
- ① Wastewater per 40 CFR 261.3(a)(2)(iv)
  - ② Convert non-HW Sludge - SLK Wastewater Sludge tote
  - ③ " " " " " - Dyes & Acusol tote
  - ④ Convert Lines that gen wipes with ink
  - ⑤ Surface lab (and any other) solid debris (PPE-gloves/wipes)  
contaminated with chemicals (gen waste)
  - ⑥ Convert Mainten Shop - machining residue to gen waste
  - ⑦ Surface non-HW Sludge - drum of Ying Yang / Futopia
  - ⑧ Paint Shop 5 gal pail of hardened material

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region-VII

ATTN: \_\_\_\_\_

If you have any questions about this Notice or wish to discuss your response, you may call me at \_\_\_\_\_, or \_\_\_\_\_ (Compliance Officer) at \_\_\_\_\_.

This Notice prepared by ADN 2/25/16 Date: \_\_\_\_\_

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: ROBERT POST Date: 2/25/2016  
Signature: [Signature]  
Title: ENVIRONMENTAL LEADER

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: P46  
Address: \_\_\_\_\_  
EPA ID Number: \_\_\_\_\_ Date: 2/24-25/16

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation	Description of Violation
② KAR 28-31-262 → 40CFR 265.173 (i)	Open SAA Containers - 3 <sup>unsecured</sup> open tunnels - Convert Lab. and two in Surface Lab
③ KAR 28-31-262 → 40CFR 262.34 (i)(2)	Undated <90 day accumulation containers (2 picklegal & 1 actual)
④ KAR 28-31-262 → 40CFR 265.177 (c)	Incompatibles not separated in <90 day area
⑤ KAR 28-31-262 → 40CFR 262.20	Offering HW without a manifest - Operator Lab ~ 120g/day
⑥ KAR 28-31-273 → 40CFR 273.13 (d)(1), 273.15(c) and 273.14 (c)	UW lamps open, undated & unlabeled (5 containers) UW battery tub no date (i.e. doc of length of storage)
⑦ KAR 28-31-262 → 40CFR 265.52 (c)	Provide RCRA HW related contingency plan related training
⑧ KAR 28-31-262 → 40CFR 265.16 (a)(2)	No arrangements with emergency contractors in Cont Plan
_____	_____
_____	_____
_____	_____

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII  
300 Minnesota Ave  
K.C., MO 64101  
ATTN: Dedriel Newsome

If you have any questions about this Notice or wish to discuss your response, you may call me at 913 551 7049, or Beth Koesterer (Compliance Officer) at 913 551 7677.

This Notice prepared by Dedriel Newsome Date: 2/25/16

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: ROBERT POST Date: 2/25/2016  
Signature: ENVIRONMENTAL LEADER  
Title: PLANT MGR